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November 11, 2002

Via Facsimile and Regular Mail

Donald P. Russo, Esquire
117 East Broad Street
P.O. Box 1890
Bethlehem, PA 18016-1890

Re: Lisa Baily v. Aetna, Inc.

Dear Don:

Defendant served Plaintiff with its first set of interrogatories and first set of document requests on or about September 12, 2002. Although Defendant has provided Plaintiff with two extensions of time in which to respond to these discovery requests (the last until November 4, 2002), Plaintiff's responses are still overdue. Defendant requests that Plaintiff provide her responses to Defendant's interrogatories and document requests by November 15, 2002, in order to avoid the necessity of Court intervention.

In addition, it is our understanding that, at the latest, the discovery deadline in this case will be December 31, 2002 (if the Court approves our stipulation to extend the discovery deadline). Given the quickly-approaching deadlines in this case, we are enclosing a Second Notice of Deposition for Plaintiff, Lisa Baily, scheduling her deposition for December 3, 2002. In addition, by this letter, we are requesting that plaintiff's husband be made available at our offices for his deposition on Thursday, December 5, 2002.

If you have any questions, please contact me.

Sincerely,



Jill Garfinkle Weitz

Enclosure